

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

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MAURA O'NEILL, as administrator of the Estate )  
of Madelyn E. Linsenmeir, )  
Plaintiff, )  
v. ) Civil Action No. 3:20-cv-30036-MGM  
CITY OF SPRINGFIELD, *et al.* )  
Defendants. )  
\_\_\_\_\_  
)

**JOINT MOTION TO STAY**  
**CLAIMS AGAINST SPRINGFIELD DEFENDANTS**

Defendants City of Springfield, Moises Zanazanian, Remington McNabb, and Sheila Rodriguez (collectively, the “Springfield Defendants”) and Plaintiff Maura O’Neill, as administrator of the Estate of Madelyn E. Linsenmeir (the “Estate”), respectfully move to stay the Estate’s claims against the Springfield Defendants.

As grounds, the moving parties state that they have reached an agreement to resolve the Estate’s claims against the Springfield Defendants. The matter will be presented to the City Council next week. While the agreement is being finalized, the moving parties are requesting that the Court not take further action on the claims being settled.

The moving parties’ agreement does not cover the Estate’s claims against defendants Hampden County Sheriff’s Department, Eileen Barrett, or Maureen Couture (collectively, the “HCSD Defendants”), who are not parties to that agreement. This motion does not seek any delay or stay as to the Estate’s claims against the HCSD Defendants.

Dated: April 3, 2024

Respectfully submitted,

/s/ Daniel L. McFadden

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**LOCAL RULE 7.1 CERTIFICATE**

I hereby certify that counsel for plaintiff conferred with counsel for the Springfield Defendants in a good-faith attempt to resolve or narrow the issues raised in this motion. The Springfield Defendants join this motion.

Dated: April 3, 2024

/s/ Daniel L. McFadden

**CERTIFICATE OF SERVICE**

I hereby certify that this document will be served on all parties through the Court's CM/ECF system.

Dated: April 3, 2024

/s/ Daniel L. McFadden